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Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

YESHIVA GEDOLA NA'OS YAAKOV,
INC., a New Jersey nonprofit
corporation, and ZEBRA HOLDINGS
II LLC, a New Jersey Limited
Liability Company,

Plaintiffs,

vs.

TOWNSHIP OF OCEAN, N.J. and
ZONING BOARD OF ADJUSTMENT OF
THE TOWNSHIP OF OCEAN,

Defendants.

Civil No. 3:16-00096 (FLW) (DEA)

**PLAINTIFFS'
NOTICE OF MOTION
FOR A PRELIMINARY
INJUNCTION**

TO: Howard B. Mankoff, Esq.
Marshall Dennehey Warner Coleman & Goggin
425 Eagle Rock Avenue, Suite 302
Roseland, NJ 07068
Attorney for Defendants Township of Ocean, N.J. and Zoning
Board of Adjustment of the Township of Ocean

PLEASE TAKE NOTICE that on a date to be set by the Court, the undersigned attorneys for Plaintiffs shall apply to the United States District Court for the District of New Jersey, at the Clarkson S. Fisher Federal Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey, 08608 for an order compelling Defendants to cease enforcement of ordinances that violate statutory and constitutional provisions and suppress religious freedom and directing the issuance of building and other permits so that Plaintiffs may begin interior renovations at the existing school building.

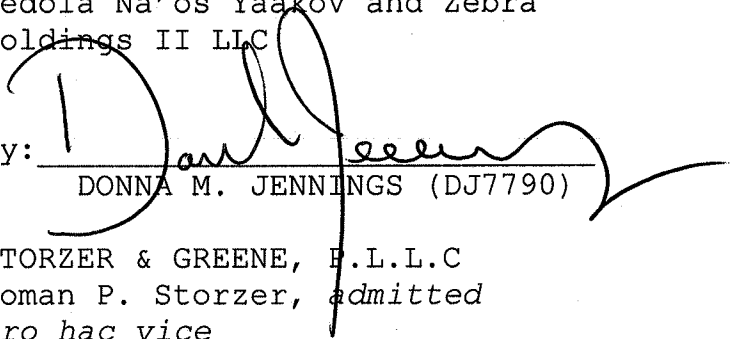
PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiff submits Declarations from several individuals (Donna M. Jennings, Rabbi Shlomo Lesin, Zeev Rothschild, Andrew Janiw, and Stephen Carlidge) in support of injunctive relief along with a Brief. A proposed form of Order is also submitted herewith.

I hereby certify that on February 4, 2016, the original of the within Notice of Motion for Preliminary Injunctive Relief, Brief, Declarations and the proposed form of Order, were filed (electronically) with the Clerk of the United States District Court for the District of New Jersey, and that a true copy of all the aforementioned papers were also served via UPS Overnight Mail upon all counsel of record listed above.

PLEASE TAKE FURTHER NOTICE that oral argument is respectfully requested in the event Defendants oppose this motion.

WILENTZ, GOLDMAN & SPITZER, P.A.
Attorneys for Plaintiffs Yeshiva
Gedola Na'os Yaakov and Zebra
Holdings II LLC

DATED: February 4, 2016

By: 
DONNA M. JENNINGS (DJ7790)

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